

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
)  
EBRO FOODS, INC. ) Judge Eugene Wedoff  
)  
Debtor and Debtor in Possession. ) Case No. 09-10101  
)  
) Hearing: April 22, 2009 at 9:30 AM

**NOTICE OF MOTION**

To: See attached service list

PLEASE TAKE NOTICE that on April 22, 2009 at 9:30 AM, I shall appear before the Honorable Eugene Wedoff, or any other Judge sitting in his stead, in Courtroom 744, Dirksen Federal Building, 219 S. Dearborn St., Chicago, IL, and shall then and there present the Debtors' **Motion to Set Last Day to File Proofs of Claim**, a copy of which is enclosed and is herewith served upon you, and at which time and place you may appear and be heard.

/s/ Forrest L. Ingram  
One of Debtors' attorneys

Forrest L. Ingram #3129032  
Peter L. Berk  
Patrick Lambe  
Helena Milman  
Gautham Kaveti  
Forrest L. Ingram P.C.  
79 West Monroe, Suite 900  
Chicago, Illinois 60603  
(312) 759-2838

**CERTIFICATE OF SERVICE**

I, Patrick Lambe, an attorney, certify that I caused a true and correct copy of the above and foregoing notice and the document to which it refers to be served upon the parties listed below, via electronic delivery and U.S. Mail, as indicated on the list, on April 17, 2009.

/s/ Patrick Lambe

**Via U.S. Mail**

**Debtor**

Ebro Foods, Inc.  
1330 W. 43<sup>rd</sup> St.  
Chicago, IL 60609

**Via CM/ECF and Fax**

**US Trustee**

William T. Neary  
Office of the United States Trustee  
Northern District of Illinois  
219 S. Dearborn St., Room 873  
Chicago, IL 60604

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

In re: ) Chapter 11  
)  
EBRO FOODS, INC. ) Judge Eugene Wedoff  
)  
Debtor and Debtor in Possession. ) Case No. 09-10101  
)  
) Hearing: April 22, 2009 at 9:30 AM

**MOTION TO SET BAR DATE FOR FILING PROOFS OF CLAIM**

Now comes the Debtor and Debtor in Possession, EBRO FOODS, INC. (the “Debtor”), by and through its attorneys at Forrest L. Ingram, P.C., and moves this Honorable Court for entry of an order setting a bar date for the filing of proofs of claim. In support thereof, the Debtor states as follows:

1. On March 24, 2009, Debtor filed a voluntary case under Chapter 11 of Title 11 of the United States Code (“Bankruptcy Code”).
2. The Debtor wishes to set a fixed period within which creditors may file proofs of claim.
3. The Debtor requests that June 24, 2009 be set as the last day for non-governmental creditors to file their proofs of claim in each case.
4. The Debtor requests that September 21, 2009 be set as the last day for governmental creditors to file their proofs of claim. This deadline would be more than six (6) months following the order for relief in these cases.
5. Debtor’s counsel shall serve notice of the bar dates upon all creditors by April 29, 2009.

WHEREFORE, the Debtor, Ebro Foods, Inc., respectfully requests that this Honorable Court a) set a bar date for both non-governmental and governmental creditors as set forth above and b) grant the Debtor such other and further relief as this Court deems just and equitable.

Respectfully submitted,

Ebro Foods, Inc.

By: /s/ Forrest L. Ingram  
One of their attorneys

Forrest L. Ingram #3129032

Peter L. Berk

Patrick Lambe

Helena Milman

Gatham Kaveti

Forrest L. Ingram P.C.

79 West Monroe, Suite 900

Chicago, Illinois 60603

(312) 759-2838